

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF
MISSOURI SOUTHERN DIVISION**

TRAVIS DUNCAN,)	
)	
Plaintiff,)	
)	Case No. 17CV-03404-BP
v.)	
)	
BLACKBIRD PRODUCTS GROUP, LLC,)	
)	
Defendant.)	

**DEFENDANT BLACKBIRD PRODUCTS GROUP, LLC’ S MOTION FOR SUMMARY
JUDGMENT**

COMES NOW, Defendant Blackbird Products Group, LLC, hereafter referred to as “Defendant,” by and through its attorney Christopher P. Lawson of Lawson Law Office, LLC, requests entry of summary judgment in Defendants favor and against Plaintiff Travis Duncan on all of his claims against Defendant pursuant to Federal Rule of Civil Procedure 56. In support of Defendants motion, Defendant submits the accompanying brief. As the brief requests, Defendant asks the court to enter summary judgment in Defendants favor and against Travis Duncan as follows:

1. Duncan fails to present any evidence to support his claim he registered his work.
2. Duncan is not the owner of the copyright under work made for hire.
3. Duncan does not own a valid registration.
4. Duncan failed to register and/or register timely.
5. The parties had an express agreement that Blackbird would own the photos.
6. Blackbird had an implied license to use the image to summary judgment.
7. Blackbird is entitled to summary judgment based on equitable estoppel.

8. Duncan's DCMA counts fail as Duncan fails to present any evidence to support his claim and none of his theories are legally viable.

9. Blackbird is entitled to summary judgment on Duncan's Quantum Meruit-unjust enrichment because Duncan fails to present any evidence to support his claim and none of his theories are legally viable.

WHEREFORE, Blackbird prays that summary judgment be granted in their favor and that costs be assessed against Plaintiff and for such other and further relief as this Court may deem just and equitable.

Respectfully Submitted,

LAWSON LAW OFFICE, LLC

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CERTIFICATE OF SERVICE

I DO HEREBY CERTIFY that a true and correct copy this document was e-filed without error and was transmitted to Plaintiff and Counsel by the Court's Electronic Case File System on December 1, 2020 addressed to:

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